

PAUL
HASTINGS

1(212) 318-6267
saratomezsko@paulhastings.com

December 7, 2021

59605.00060

VIA ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Ulku Rowe v. Google LLC*, 1:19-cv-08655(LGS)(GWG)

Your Honor:

We represent Google LLC in the above-reference matter. Pursuant to Rule I.B.2 of Your Honor's Individual Rules and Procedures for Civil Cases, we write to request a brief extension of time file a motion to keep portions of Plaintiff's Summary Judgment filing (ECF Nos. 152–160) under seal. The original deadline to file the motion is tomorrow, December 8, 2021, two business days after the documents were originally filed. We are seeking a brief extension until Friday, December 10, 2021. We have met and conferred with Plaintiff's counsel, who has represented to us that tomorrow, they will ask the Clerk to remove certain documents containing confidential information erroneously filed on the public docket without Google's consent. The extension is necessary to ensure that the confidential information has been removed before Google files its motion to seal, and to avoid the need to file another sealing motion after the docket has been corrected to identify additional confidential documents. This is our first request for an extension of time to file this sealing motion, and Plaintiff consents to the request.

Thank you for your continued attention to this matter.

Respectfully submitted,


Sara B. Tomezsko

of PAUL HASTINGS LLP

cc: All counsel of record (via ECF)

LEGAL_US_W # 110415470.1